



Hewlett-Packard Company
1000 NE Circle Boulevard
Corvallis, Oregon 97330-4239
541/715-2000

June 27, 2005

VIA ELECTRONIC AND U.S. MAIL

Mr. Fareed Ferhut
Integrated Waste Management Specialist
Buy Recycled Section
CIWMB
P.O. Box 4025, MS-12
Sacramento, CA 95812

Dear Mr. Ferhut:

Hewlett Packard ("HP") has reviewed your letter to Interested Parties dated May 23, 2005, seeking comments on your efforts to establish an Environmentally Preferable Product ("EPP") standard for print cartridges. As we understand from your letter, an EPP Task Force jointly composed of California Integrated Waste Management Board ("CIWMB") and Department of General Services ("DGS") representatives will develop this standard, with help from the print cartridge manufacturers and other interested parties. We are pleased that you have included HP in this process, and we look forward to taking an active and supportive role throughout the time frame you have outlined. In this letter, we will provide our views on the procedure the EPP Task Force should consider in developing the print cartridge EPP standard. We will reserve our comments on substantive issues until later in the standard development process.

As a first point, we recommend that you consider the scope of the present effort and clearly define the affected products. While your letter refers to a standard for "printing cartridges," we recommend that the EPP Task Force focus on monochrome toner print cartridges with this EPP standard. Included within the definition of a monochrome toner print cartridge are original as well as remanufactured, refilled or otherwise refurbished print cartridges intended for use in an electrophotographic printing device (i.e., a laser printer). We believe this is an appropriate scope based on the scope of the referenced Public Contract Code and the products addressed within the State Agency Buy Recycled Campaign.

We agree with your assessment that the California Public Contract Code offers four valuable benchmarks for determining an EPP cartridge standard. We believe that EPP Task Force emphasis on these benchmarks as the basis for developing the applicable standard is appropriate. We also wish to point out that the Public Contract Code, at Section 12400, defines EPP in the following manner:

Environmentally preferable purchasing "means the procurement or acquisition of goods and services that have a lesser or reduced effect on human health and the environment when compared with competing goods or services that serve the same purpose. This comparison shall take into consideration, to the extent feasible, raw materials acquisition, production,

manufacturing, packaging, distribution, reuse, operation, maintenance, disposal, energy efficiency, product performance, durability, safety, the needs of the purchaser, and cost."

We are of the opinion that the EPP Task Force should also use this definition, as a guiding principle in developing the applicable EPP print cartridge standard.


Your benchmarks acknowledge different but important factors. For this reason, we recommend that the EPP Task Force give careful consideration to each of the aspects and impacts considered in the standard. We agree that the EPP standard must provide "an easy and effective benchmark to readily identify EPP cartridges," as you write on page 1 of your letter. To this end, we would suggest that the EPP task force develop no more than two or three identifiable performance criteria applicable to each benchmark. We also recommend that, whenever possible, the EPP standard incorporate existing and accepted metrics for each performance criterion.

We urge EPP Task Force to adopt guidelines that permit manufacturers to achieve the EPP goals in a flexible manner. For example, the four current benchmarks in the PCC generally pertain to waste generation, recycling, and end of life issues. Reducing solid waste is certainly one appropriate measure of environmental performance. In order to achieve this goal most effectively, companies should have the flexibility of satisfying this aspect of EPP through one, or a combination of the four benchmarks (e.g., either using recycled content or providing a recycling program). However, the Task Force should not compel companies to satisfy each one as a means of achieving the goal of reduced waste generation and qualifying for the EPP designation. Accordingly, a print cartridge with no restrictions on recycling or remanufacturing (Benchmark No. 1) covered by a "take back and recycling" program that ensures the product does not add to California's landfills as solid waste (Benchmark No. 4) represents an environmentally responsible product, and should qualify as EPP.

We also recommend that after the Task Force has created an applicable standard for determining whether print cartridges qualify as EPP, the Task Force should authorize a system of self-certification, rather than third party certification, in accordance with the agreed-upon benchmarks. Such self-certifications would be subject to applicable enforcement provisions, and would therefore be an efficient and enforceable system for identifying products meeting the EPP standard.

Once again, thank you very much for including us in this process. We applaud your efforts to date, and look forward to being a valuable member of your EPP development team.

Sincerely,



J. Scott Canonico
Manager, Environmental Policy
Imaging and Printing Supplies